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*Attorneys for Defendants State of Nevada,
James "Greg" Cox, Timothy Filson,
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VICTOR PEREZ, as Special Administrator
of the Estate of CARLOS PEREZ,
deceased; VICTOR PEREZ, as Guardian
Ad Litem for S.E.P., a minor; VICTOR
PEREZ, as Guardian Ad Litem for A.I.P., a
minor,

Plaintiffs,

vs.

STATE OF NEVADA, ex.rel. NEVADA
DEPARTMENT OF CORRECTIONS;
DIRECTOR GREG COX, individually;
WARDEN DWIGHT NEVEN, individually;
ASSISTANT WARDEN TIMOTHY
FILSON, individually; COT. RAMOS,
individually; LIEUTENANT OLIVER,
individually; CORRECTIONS OFFICER
CASTRO, individually; CORRECTIONS
OFFICER SMITH, individually; and
DOES I-X, inclusive; and ROES I-X,
inclusive,

Defendants.

CASE NO. 2:15-cv-01572-APG-DJA

**DEFENDANTS COX AND FILSON'S
REQUEST TO REMOTELY ATTEND
SETTLEMENT CONFERENCE**

Defendants Greg Cox and Timothy Filson (collectively, the "Out-of-State Defendants"), by and through counsel, pursuant to this Court's order, ECF No. 245, at 2, request to remotely attend the February 24, 2023 settlement conference.

1 The Out-of-State Defendants are retired and no longer reside in Nevada. They would
2 have to travel a substantial distance to attend the conference in person. Nevada law
3 obligates the State to indemnify both of them, so neither will be personally responsible for
4 paying any settlement amount. *See* NRS 41.0349. State officials with authority to settle
5 and pay Plaintiffs' claims will attend the settlement conference in person.

6 The Out-of-State Defendants will ensure their availability for the duration of the
7 settlement conference and can attend remotely via Zoom or a similar platform. If the Court
8 cannot facilitate remote attendance, counsel can do so. Counsel will ensure that the Out-
9 of-State Defendants can participate in all caucuses and Court sessions, and that they can
10 authorize any settlement reached.

11 DATED this 7th day of February, 2023.

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13 AARON D. FORD
Attorney General

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15 By: /s/ Kiel B. Ireland
16 Craig Newby (Bar No. 8591)
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